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October 17, 2024

VIA ECF

The Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Potential Transfer of Matter Substantially Similar to *Raanan v. Binance Holdings Limited*, No. 24 Civ. 00697 (JGK) (S.D.N.Y.)

Dear Judge Koeltl:

On behalf of Defendants Binance Holdings Limited (“BHL”) and Changpeng Zhao, we respectfully submit this letter to advise the Court that Defendants have asked the United States District Court for the Middle District of Alabama, Northern Division (the “Alabama District Court”) to transfer to this Court a matter we contend (but Plaintiffs in that matter dispute) is substantially similar to *Raanan v. Binance Holdings Limited*, No. 24 Civ. 00697 (JGK) (S.D.N.Y.).

The matter pending in the Alabama District Court is captioned *Gess v. BAM Trading Services, Inc., et al.*, No. 24 Civ. 00134 (ECM) (CWB) (M.D. Ala.). Defendants have applied to the Alabama District Court to transfer the *Gess* case to this Court under Title 28, United States Code, Section 1404. The Alabama District Court will hear argument on the motion on October 22, 2024,¹ and could issue a ruling shortly thereafter. Accordingly, Defendants are notifying the Court for its information.

¹ Defendants proposed to the Alabama District Court that it would be most efficient to defer a ruling on the transfer motion until after this Court decides the pending motion to dismiss in *Raanan*, since dismissal could obviate the transfer motion. The Alabama District Court has

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Defendants stand ready to supply any additional information the Court may require.

Respectfully submitted,

/s/ Samson A. Enzer

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not yet indicated whether it would defer its ruling, although, as indicated, argument on the motion is scheduled for October 22.